1 2 3 4 5 6 7 8	SAO DAN M. WINDER, ESQ. Nevada State Bar. No. 1569 SCOTT C. DORMAN, ESQ. Nevada State Bar No. 13108 KRISTINA MILETOVIC, ESQ. Nevada State Bar No. 14089 LAW OFFICE OF DAN M. WINDER, P.C. 3507 W. Charleston Blvd. Las Vegas, NV 89102 Telephone: (702) 474-0523 Facsimile: (702) 474-0631 winderdanatty@aol.com Attorneys for Plaintiff	
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11	UNITED STATES DISTRICT COURT	
12	DISTRICT OF NEVADA	
13	_	
14	NORI EVANS, an individual,	Case No: 2:15-cv-01136-MMD-(CWH)
15	Plaintiff,	STIPULATION AND ORDER
16	vs.	TO
17	UNIVERSITY MEDICAL CENTER a.k.a.	EXTEND DEADLINES FOR
18	UNIVERSITY MEDICAL CENTER OF SOUTHERN NEVADA a.k.a. UMC, a	PLAINTIFF'S RESPONSE TO DEFENDANT'S SECOND MOTION FOR
19	political subdivision of Nevada; DOES I-V; ROES VI-X,	SUMMARY JUDGMENT (ECF No. 82) AND
20	,	DEFENDANT'S RESPONSE TO
21	Defendants.	PLAINTIFF'S MOTION FOR RECONSIDERATION (ECF No. 84)
22		[FIRST REQUEST]
23		
24		
25	IT IS HEREBY STIPULATED AND AGREED, by and between Plaintiff Nori Evans and	
26	Defendant University Medical Center, by and through their respective undersigned counsel of	
27	record, that Plaintiff shall have two (2) additional weeks to file and serve her Response to	
28	Defendant's Second Motion for Summary Judgment (ECF No. 82). The parties agree the deadline	

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for filing Plaintiff's Response shall now be Tuesday, May 29, 2018.

IT IS ALSO STIPULATED AND AGREED that Defendant shall have two (2) additional weeks to file and serve its response to Plaintiff's Motion for Reconsideration of Interlocutory Order (ECF No. 84). The parties agree the deadline for filing Plaintiff's Response shall now be Tuesday, June 4, 2018.

The reasons for this request are the following:

- 1. Defendant's counsel was involved in a car accident that was caused by an apparent intoxicated motorist. As a result, he has been required to take a number of days off in order to seek treatment and recover. He also is expected to miss additional time from work in the near future.
- 2. In addition to the normal, anticipated workload, Plaintiff's counsel has been working on a Petition for Rehearing in the Nevada Supreme Court in the case *Abate v. Ace Cab*, case no. 68849, a deadline on the same day Plaintiff's Response to Defendant's Second Motion for Summary Judgment is currently due in this matter, May 15, 2018.
- 3. The parties have not sought to extend these deadlines before and merely request two additional weeks.
- 4. This stipulation is entered into in good faith and not to cause undue delay.

**DATED** this 11th day of June, 2018.

**DATED** this 11th day of June, 2018.

LAW OFFICE OF DAN M. WINDER, P.C.

/s/ Kristina Miletovic DAN M. WINDER, ESQ.

Nevada Bar Number: 1569 KRISTINA MILETOVIC, ESQ.

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PITEGOFF LAW OFFICE

<u>/s/\_Jeffrey I. Pitegoff</u>

JEFFREY I. PITEGOFF, ESQ. Nevada Bar Number: 5458

330 E. Charleston Blvd., Suite 100

Las Vegas, Nevada 89104 Tel: (702) 808-7976 ipitegoff@yandex.com Attorneys for Defendant

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## **ORDER**

**IT IS HEREBY ORDERED** Plaintiff shall have until Tuesday, May 29, 2018 to file her Response to Defendant's Second Motion for Summary Judgment (ECF No. 82).

**IT IS ALSO HEREBY ORDERED** Defendant shall have until Tuesday, June 4, 2018 to file its response to Plaintiff's Motion for Reconsideration of Interlocutory Order (ECF No. 84).

IT IS SO ORDERED.

**UNITED STATES DISTRICT JUDGE** 

DATED: \_May 14, 2018

## **CERTIFICATE OF SERVICE** Pursuant to LR 5-1, I hereby certify that I am an employee of the LAW OFFICE OF DAN M. WINDER, P.C., and that on the 11th day of May, 2018, I served the **STIPULATION AND** ORDER TO EXTEND DEADLINES FOR PLAINTIFF'S RESPONSE TO DEFENDANT'S SECOND MOTION FOR SUMMARY JUDGMENT (ECF No. 82) AND DEFENDANT'S RESPONSE TO PLAINTIFF'S MOTION FOR RECONSIDERATION (ECF No. 84) [FIRST REQUEST] on counsel as follows: E-Service pursuant to LR IC 4-1: Jeffrey I. Pitegoff, Esq. Nevada State Bar No. 5458 PITEGOFF LAW OFFICE 330 E. Charleston Blvd., Suite 100 Las Vegas, NV 89104 Tel: (702) 808-7976 jpitegoff@yandex.com Attorney for Defendant University Medical Center /s/ Kristina Miletovic Employee of the Law Office of Dan M. Winder P.C.